

PROPOSED DECISION

Agenda ID #12644 (Rev. 1)
Quasi-Legislative
1/16/2014 Item 17

Decision **PROPOSED DECISION OF COMMISSIONER FLORIO**
(Mailed 12/13/2013)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities.

Rulemaking 08-11-005
(Filed November 6, 2008)

**DECISION APPROVING THE WORK PLAN FOR
THE DEVELOPMENT OF FIRE MAP 1**

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**DECISION APPROVING THE WORK PLAN FOR
THE DEVELOPMENT OF FIRE MAP 1**

1. Summary

This decision approves a work plan for the first step of a two-step process for the development of a statewide fire-threat map. The purpose of the fire-threat map is to accurately identify areas where there is an elevated risk of power-line fires occurring and spreading rapidly so that fire-prevention measures adopted in this proceeding can be deployed effectively.

The first step is to design, develop, and adopt a statewide fire-threat map that depicts the physical and environmental conditions associated with an elevated risk of power-line fires (Fire Map 1). The second step is to develop and adopt of a statewide map that designates utility fire-hazard zones where fire-prevention measures will be deployed (Fire Map 2). The work plan approved by this decision pertains only to Fire Map 1.

Much of the work for the design and development of Fire Map 1 will be performed by the California Department of Forestry and Fire Protection (Cal Fire). Three electric utilities (Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company) will jointly provide up to \$250,000 for Cal Fire to obtain expert consultants to assist in the design and development of Fire Map 1. This decision establishes a rebuttal presumption that the electric utilities' payments to experts selected by Cal Fire are reasonable and may be recovered in rates using the procedures set forth in Decision 12-01-032.

2. Procedural Background

In October 2007, devastating wildfires driven by strong Santa Ana winds burned hundreds of square miles in Southern California. Several of the worst wildfires were reportedly ignited by overhead power lines and aerial communications facilities in close proximity to power lines. In response to these wildfires, Commission initiated this rulemaking proceeding to consider and adopt regulations to protect the public from potential fire hazards associated with overhead power-line facilities and nearby aerial communications facilities.

This proceeding has been conducted in phases. The purpose of Phase 1 was to adopt fire-safety measures that could be implemented in time for the 2009 autumn fire season in Southern California. Phase 1 concluded with the issuance of Decision (D.) 09-08-029. The purpose of Phase 2 was to adopt fire-safety measures that required more time to consider and implement. Phase 2 concluded with the issuance of D.12-01-032. Both of these decisions amended General Order (GO) 95 to incorporate new and revised rules that are intended to protect the public from fire hazards associated with overhead power lines and aerial communications facilities in close proximity to power lines.

Several of the new and revised rules adopted in Phase 1 and Phase 2 rely on maps that designate areas where there is an elevated risk of power-line fires occurring and spreading rapidly ("fire-threat maps"). These rules include:

- GO 95, Rule 18A, which requires electric utilities and communications infrastructure providers (CIPs) to place a high priority on the correction of significant fire hazards in high fire-threat areas of Southern California.
- GO 95, Rules 31.2, 80.1A, and 90.1B, which set the minimum frequency for inspections of aerial communication facilities located in close proximity to power lines in high fire-threat areas throughout California.

- GO 95, Rule 35 and Appendix E, which mandate increased time-of-trim clearances between vegetation and energized conductors in high fire-threat areas of Southern California.
- GO 95, Rule 35, Table 1, Case 14, which requires increased radial clearances between bare-line conductors and vegetation in high fire-threat areas of Southern California.
- GO 165, Appendix A, Table 1, which requires more frequent patrol inspections of overhead power-line facilities in rural, high fire-threat areas of Southern California.
- GO 166, Standard 1.E., which requires electric utilities in Southern California to develop and submit a plan to reduce the risk of fire ignitions by overhead facilities in high fire-threat areas during extreme fire-weather events. Electric utilities in Northern California must also develop and submit a plan if they have overhead facilities in high fire-threat areas that are subject to extreme fire-weather events.

The effectiveness of the above measures at reducing the risk of devastating power-line fires depends on fire-threat maps that accurately identify areas where power-line fires are more likely to occur and spread rapidly.

The Phase 1 and Phase 2 Decisions adopted three fire-threat maps on an interim basis for use in conjunction with the previously identified fire-prevention measures. These are the so-called Reax Map, SDG&E Map, and FRAP Map. The Reax Map was developed by the CIP Coalition and covers Northern California. The SDG&E Map was developed by San Diego Gas & Electric Company (SDG&E) and covers SDG&E's service territory. The FRAP Map was developed by the California Department of Forestry and Fire Protection (Cal Fire) and is used for areas of Southern California that are not covered by the SDG&E Map.

The Reax Map and SDG&E Map were specifically designed to identify areas where there is a heightened risk of power-line fires. Both maps take into account the major factors that contribute to the ignition and spread of power-line

fires, including wind, vegetation, and topography. However, neither map has been reviewed by neutral fire-safety experts such as Cal Fire. Given the critical public safety importance of fire-threat maps, the Commission concluded in the Phase 2 Decision that the Reax Map and the SDG&E Map should be reviewed by neutral experts before these maps are adopted permanently.

The FRAP Map is ill-suited for identifying high-risk areas for power-line fires. The Phase 1 Decision nonetheless adopted the FRAP Map because there was no better fire-threat map available. In the Phase 2 Decision, the Commission concluded that the ill-suited FRAP Map should be replaced with a purpose-built fire-threat map.

The Phase 2 Decision established a new Phase 3 of this proceeding to pursue several objectives, including (1) the development and adoption of permanent fire-threat maps that cover the entire State; and (2) the development and adoption of a new High Fire-Threat District based on the newly adopted fire-threat maps; (3) development and adoption of new fire-safety standards for the design and construction electric utility and CIP structures in the High Fire-Threat District; and (4) assessing whether any of the new fire-safety standards developed pursuant to the previous Item 3 should apply to existing facilities in the High Fire-Threat District. The Phase 2 Decision also determined that the first step towards the development of permanent fire-threat maps would be the preparation of a detailed work plan for completing this task.

The Phase 3 Scoping Memo issued on May 1, 2012, and the Amended Phase 3 Scoping Memo issued on May 15, 2013, together divided Phase 3 into three separate “tracks,” with each track addressing designated issues. The Amended Phase 3 Scoping Memo included within the scope of Track 3 all of the objectives identified in the previous paragraph.

To attain the objectives for Track 3, the Amended Phase 3 Scoping Memo established an all-party, self-directed Technical Panel (the “Track 3 Panel”) to prepare a work plan for achieving the objectives; directed the Track 3 Panel to hold workshops to draft the work plan; and instructed the Track 3 Panel to submit a workshop report that contains the following:

1. A detailed work plan for the funding, development, expert review, adoption, and implementation of fire-threat maps that:
 - i. Cover the entire State.
 - ii. Identify high fire-threat areas where there is an elevated risk of power-line fires occurring and spreading rapidly.
 - iii. Identify the types and locations of (a) overhead power-line facilities in high fire-threat areas, and (b) aerial communications facilities in close proximity to overhead power-line facilities in high fire-threat areas.
 - iv. Integrate with the fire-prevention measures adopted in this proceeding that rely on fire-threat maps.
 - v. Are available to Commission staff, fire-safety agencies, and the public, while also protecting information about critical infrastructure or which may be proprietary.
2. Includes the following steps and procedures in the work plan:
 - i. Determining the necessary characteristics of the fire-threat maps, including the specific information to be included in the maps and the level of detail.
 - ii. Determining if the existing Reax Map and SDG&E Map possess all the necessary characteristics determined in Item 2.i., or, if not, whether these maps can be modified to possess the necessary characteristics.
 - iii. Based on the results of Item 2.ii, determining if it is necessary to develop new fire-threat maps and, if so, the steps necessary to develop new fire-threat maps.
3. The specific expertise from neutral third parties that is needed, if any, to carry out Item 2 above; how this expertise will be obtained; and recommendations for obtaining assistance from Cal Fire and other neutral experts, if needed, for Item 2.

4. If the work plan anticipates contracting with neutral experts to assist with Item 2 above, the work plan shall (a) identify who will select the experts; (b) explain the contracting process; and (c) identify who will oversee the work of the experts.
5. The estimated cost to carry out Item 2 above, including the cost of contracting with neutral experts, if necessary.
6. A funding mechanism, if needed, for the development, expert review, and implementation of fire-threat maps.
7. A proposed schedule, recommended procedures (e.g., workshops), and milestones for the development, expert review, adoption, and implementation of fire-threat maps. The process should include an opportunity for parties to participate, request evidentiary hearings, and file comments and/or briefs.
8. A discussion of whether electric utilities and CIPs should be able to make small scale adjustments to the boundaries of the high fire-threat areas and, if so, how such adjustments should be vetted and incorporated into the fire-threat maps.
9. A description of how fire-threat maps adopted by the Commission should be updated, the frequency of updates, and the procedure for incorporating updated maps into GO 95, GO 165, and other GOs, if applicable.
10. A proposed schedule, recommended procedures (e.g., workshops), and milestones for other Track 3 objectives.
11. An explanation of whether the matters addressed in Track 3 are subject to the California Environmental Quality Act (CEQA) and, if so, when and how the CEQA review would occur.
12. Alternative recommendations if the Track 3 Panel cannot reach a consensus on all issues. The alternatives should provide the same level of detail as the work plan.
13. A list of Commission actions that may be required to implement the elements of the work plan and alternatives.

The Track 3 Panel held publicly noticed workshops and other meetings in June – September 2013 to develop the work plan. On September 23, 2013, the Commission’s Safety and Enforcement Division (SED) filed and served the

Phase 3, Track 3 Technical Panel Report for the Workshops Held June –September 2013 (hereafter, the “Track 3 Report”), which included an attached Proposed Work Plan. Both documents were sponsored jointly by the following parties:

Sponsors of the Track 3 Report and Proposed Work Plan
AT&T California and New Cingular Wireless PCS, LLC (AT&T)
Bear Valley Electric Service (Bear Valley)
California Cable and Telecommunications Association (CCTA)
Cal Fire
California Municipal Utilities Association
Comcast Phone of California, LLC (Comcast)
County of Los Angeles Fire Department (LA County Fire Dept.)
Cox California Telecom, LLC and Cox Communications California, LLC (Cox)
Crown Castle NG West, Inc. (f/k/a NextG Networks of California, Inc.)
Extenet Systems
Frontier Communications (Frontier)
Hans Laetz
Liberty Utilities LLC (Liberty Utilities)
Los Angeles Department of Water and Power
Mussey Grade Road Alliance (MGRA)
Pacific Gas and Electric Company (PG&E)
PacifiCorp, d/b/a Pacific Power (PacifiCorp)
SDG&E
SED
The Small Local Exchange Carriers (Small LECs) ¹

¹ The Small LECs are the following carriers: Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company,

Footnote continued on next page

Sponsors of the Track 3 Report and Proposed Work Plan
Southern California Edison Company (SCE)
Sunesys, LLC
SureWest Telephone (SureWest)
Time Warner Cable (TWC)
tw telecom of california, llp (tw telecom)
Verizon

Opening comments regarding the Track 3 Report and Proposed Work Plan were filed on October 7, 2013, by SDG&E and jointly by the LA County Fire Dept., MGRA, and SED. Reply comments were filed on October 14, 2013, by a coalition of communications infrastructure providers (the CIP Coalition),² MGRA, and jointly by the LA County Fire Dept. and SED.

A motion for an evidentiary hearing on the Proposed Work Plan was filed on October 17, 2013, by the CIP Coalition. The motion was denied in a ruling issued on November 20, 2013, by the assigned Administrative Law Judge (ALJ).

3. Summary of the Proposed Work Plan

The Proposed Work Plan provides the Track 3 Panel's consensus recommendations for addressing Track 3 issues. A copy of the Proposed Work Plan is contained in Appendix A of this decision. The main elements of the Proposed Work Plan are summarized below.

Inc., The Siskiyou Telephone Company, Volcano Telephone Company, and Winterhaven Telephone Company.

² The CIP Coalition consists of the following entities: AT&T; CCTA; Comcast; Cox; Crown Castle NG West, Inc.; CTIA-The Wireless Association®; Extenet Systems (California) LLC; Frontier; the Small LECs; Sprint-Nextel; Sunesys, LLC; SureWest; T-Mobile West LLC; TWC; tw telecom; and Verizon California Inc.

3.1. Two-Step Process for Developing Fire-Threat Maps

The Proposed Work Plan recommends a two-step process for the design, development, adoption, and implementation of a statewide fire-threat map. The goal of the first step is to develop and adopt a scientifically based fire-threat map that depicts the physical and environmental conditions associated with an elevated potential for utility-associated wildfires (hereafter, "Fire Map 1"). The second step is to develop a statewide map that depicts utility fire-threat zones where the fire-safety regulations adopted in this proceeding for high fire-threat areas would apply (hereafter, "Fire Map 2").

The members of the Track 3 Panel reached a consensus that the mapping of fire hazards must precede the mapping of utility fire-threat zones. Thus, the Proposed Work Plan is limited to the development of Fire Map 1. Once Fire Map 1 is available, the Track 3 Panel will turn to the development of Fire Map 2 and revising GO 95 to incorporate a new High Fire-Threat District and fire-safety standards for the new district.

3.2. California Department of Forestry and Fire Protection

The Proposed Work Plan assigns the task of designing Fire Map 1 to the California Department of Forestry and Fire Protection (Cal Fire). Cal Fire will organize and lead a team with expertise in a range of disciplines, including mechanical engineering/stress analysis; wildland fuels and fire behavior science; heat transfer modeling; meteorology; actuarial science and risk analysis; geographic information systems and spatial model development; and modeling sensitivity. Cal Fire, in its sole discretion, will identify, select, and oversee the specific expertise, experts, and internal and external resources it deems necessary to design Fire Map 1.

Cal Fire and its team of experts will conduct an independent review of the existing Reax and SDG&E fire-threat maps; solicit and review input from the parties; and develop the requirements for a scientifically valid, accurate, and workable Fire Map 1. An overview of Cal Fire's work is provided below:

- Most work will be conducted by the team of experts. The team will undertake the day-to-day development of Fire Map 1.
- SED will facilitate meetings and information exchanges with stakeholder experts. Stakeholder experts may meet with Cal Fire and its experts to receive status reports and provide real time input on key Fire Map 1 elements so that Cal Fire has access to the best available information and expertise. The meetings and information exchanges will be restricted to the scientific objectives of Fire Map 1.
- SED will convene publically noticed, all-party meetings of the Track 3 Panel where status reports will be presented. These meetings will include at least one where Reax and SDG&E present criteria, methodology, findings, and lessons learned from the creation of their fire-threat maps, and a second meeting where Cal Fire and its experts will present their findings and recommendations to the Track 3 Panel.

Cal Fire will have the ultimate authority to make the final recommendations for the experts working under its direction. SED will provide administrative and institutional support to Cal Fire and its team.

3.3. Funding for Cal Fire

Three investor-owned electric utilities (IOUs) - PG&E, SCE, and SDG&E - have volunteered to pay for the external experts and resources deemed necessary by Cal Fire, subject to the following conditions:

1. Total payments by the IOUs through the creation of Fire Map 1 will not exceed \$250,000 unless the requirements of Condition No. 5, below, are met.
2. The payments by the IOUs shall have no precedential value for any other aspect of this proceeding or future proceeding.

3. The IOUs may record their payments in their Fire Hazard Prevention Memorandum Accounts (FHPMAs) that are described in D.12-01-032 at pages 153 -156.
4. Payments by the IOUs that do not exceed the cost cap of \$250,000 shall be presumed reasonable by the Commission.
5. Cal Fire and/or SED must seek Commission approval to exceed the cost cap, if needed. The responsibility for expenditures above the initial \$250,000 cost cap will be considered at that time. If PG&E, SCE, and SDG&E agree to pay the additional Cal Fire expenses, any costs booked in the IOUs' FHPMAs will be presumed reasonable up to any new cost cap authorized by the Commission.

The IOUs will prepare and execute contracts appropriate to Cal Fire's requirements and the IOUs' contracting practices. The contractors will record billable costs (time, materials, and expenses), which will be reviewed by Cal Fire and/or SED. After approval from Cal Fire and/or SED, the contractors will directly bill each of the three participating IOUs for its share of the billable costs using the following allocation: PG&E (49%), SCE (41%), and SDG&E (10%). This allocation is based on 2011 annual electric revenue.

3.4. Map Review and Development Report

Cal Fire, with administrative support from SED, will prepare a Map Review and Development Report that contains the findings and recommendations of Cal Fire, any alternative recommendations received from stakeholders, and a detailed work plan for the creation of Fire Map 1. The report will include recommendations on the following matters:

- a. The fire hazards that should be reflected in Fire Map 1.
- b. The data and source information that should be used to depict the physical and environmental conditions shown in Fire Map 1.
- c. The methodologies by which the data and source information will be transmuted into graphic form.

- d. Whether, and to what extent, the existing Reax and SDG&E fire-threat maps might serve the purposes of Fire Map 1 and, if not, the manner in which they might be modified to serve those purposes.
- e. The manner for updating Fire Map 1 periodically.
- f. How Fire Map 1 will be delivered to the parties in a medium importable into geographic information systems.
- g. Other relevant matters as determined by Cal Fire.

SED will serve the report on all parties and convene a public workshop where (1) Cal Fire and its team of experts will explain their findings and recommendations, and (2) stakeholders may present alternate recommendations.

3.5. Fire Map 1 Workshop Report

The Track 3 Panel will prepare a draft Fire Map 1 Workshop Report that provides (1) recommendations to the Commission based on Cal Fire's Map Review and Development Report, (2) any alternative recommendations, and (3) a detailed work plan for the creation of Fire Map 1. The draft Fire Map 1 Workshop Report will be served and parties may provide comments and alternate proposals to the Track 3 Panel. After considering this input, the Track 3 Panel will file and serve a final Fire Map 1 Workshop Report. Parties may then file comments and request evidentiary hearings on the final report.

The Proposed Work Plan contemplates that the Commission will use the final Fire Map 1 Workshop Report and associated record to prepare a decision regarding the creation of Fire Map 1. After the Commission's decision, Cal Fire and its team of experts will produce Fire Map 1 in draft form. SED will facilitate a review of Fire Map 1 in a public process for quality assurance purposes. Once vetted, the final version of Fire Map 1 will be submitted to the Commission for adoption. After the Commission adopts Fire Map 1, the parties will reconvene to prepare a detailed work plan for Fire Map 2 and other Track 3 issues.

3.6. Proposed Work Plan Schedule

The Proposed Work Plan includes a schedule for the activities, milestones, and processes that culminate with the submission of a completed Fire Map 1 to the Commission. The proposed schedule shows that Fire Map 1 will be completed in the first quarter of 2015. If delays cause SED to believe that at least 90 additional days will be needed to complete Fire Map 1, SED will notify the assigned Commissioner and assigned ALJ about the reasons for the delay and the additional time that will be required. Cal Fire will continue its work pending further direction from the assigned Commissioner or assigned ALJ.

4. Summary of Comments on the Proposed Work Plan

4.1. SDG&E

SDG&E has several concerns with the Proposed Work Plan. To begin with, SDG&E states the Proposed Work Plan fails to describe the advantages of developing Fire Map 1 or why a large share of the work is delegated to Cal Fire. SDG&E claims there are other parties with the expertise and resources to do this work, either in collaboration with Cal Fire or by developing competing products. SDG&E asserts that it has created the best available databases and analytical methods regarding the fire threats in its service territory.

SDG&E is also concerned that the Proposed Work Plan does not address the most salient elements of the fire-threat map, namely, the location of utility facilities and the fire-safety regulations for high fire-threat areas. SDG&E claims that a full year will be spent creating Fire Map 1 which will have little use as a standalone product.

Finally, SDG&E asserts that the Proposed Work Plan does not coordinate the development of the fire-threat map and the associated fire-safety regulations. Rather, the Proposed Work Plan contemplates that Fire Map 1 will be limited to

the physical characteristics of fire hazards such as fuel conditions, wind conditions, and topography. Thus, Fire Map 1 can only provide a platform for developing the map the Commission is actually interested in creating (i.e., Fire Map 2). SDG&E submits that it would be appropriate at this early stage for the Commission to direct that mapping work be performed with due consideration for the ultimate regulatory purposes to be served by the map products.

SDG&E has two recommendations to expedite Track 3. First, SDG&E recommends that the assigned Commissioner assume full responsibility for approving the Proposed Work Plan in order to avoid the time needed to prepare and issue a Commission decision. Second, if the assigned Commissioner agrees that it is unacceptable to take one year to develop and adopt Fire Map 1, deferring the more important Fire Map 2 and fire-safety regulations to the future, SDG&E submits that an all-party event such as an oral argument be held immediately so that parties may present alternatives to the Proposed Work Plan.

4.2. LA County Fire Dept., MGRA, and SED

The LA County Fire Dept., MGRA, and SED support the Proposed Work Plan. They aver that the plan reflects the consensus of the Track 3 Panel that Cal Fire is the most qualified entity to (1) review the existing Reax and SDG&E fire-threat maps, and (2) develop the criteria for a statewide fire-threat map.

The LA County Fire Dept., MGRA, and SED oppose SDG&E's alternative plan. They state that SDG&E ignored the requirement in the Amended Phase 3 Scoping Memo to include its alternative plan in the Track 3 Report so that parties could review and comment on the alternative plan. They argue that SDG&E's attempt to bypass the Track 3 process should be rejected.

The LA County Fire Dept., MGRA, and SED assert that SDG&E's alternate plan is significantly flawed in two respects. First, it ignores the need for neutral

experts to review existing fire-threat maps. This is contrary to the Phase 2 Decision where the Commission stated, “[g]iven the vital public safety issues involved, we conclude that the Reax Map and the SDG&E Map must be reviewed by neutral experts before these maps are adopted on a permanent basis.”³

Second, SDG&E’s plan to immediately pursue the substantive development of fire-threat maps is contrary to the Commission’s intent in the Phase 2 Decision to first adopt a work plan for the development and approval of fire-threat maps.⁴

4.3. The CIP Coalition

The CIP Coalition supports the Proposed Work Plan. The CIP Coalition notes that no party availed itself of the opportunity to include an alternative work plan in the Track 3 Report. The CIP Coalition objects to SDG&E’s use of its opening comments on the Track 3 Report to submit an alternative plan for consideration. The CIP Coalition states that SDG&E’s conduct violates the procedures established by the Amended Phase 3 Scoping Memo and the workshop protocols adopted by the parties, including SDG&E.

5. Discussion

The issue before us is whether to adopt the Proposed Work Plan. As set forth in the Phase 2 Decision and the Amended Phase 3 Scoping Memo, it was our expectation that the Proposed Work Plan would present a detailed path for achieving all the objectives for Track 3 of this proceeding.

The Proposed Work Plan falls short of our expectation. Although the Proposed Work Plan will accomplish the important objective of designing,

³ D.12-01-032 at 145.

⁴ D.12-01-032 at 146 - 147.

developing, and adopting Fire Map 1, the Proposed Work Plan does not address other objectives for Track 3, including (1) a work plan for the development of Fire Map 2; (2) the actual development, production, and Commission approval of Fire Map 2; and (3) the development and approval of the High Fire-Threat District and associated fire-safety standards for utility structures in the new district. Nor does the Proposed Work Plan include a schedule for completing all Track 3 objectives. It appears, at this point, that it could take several years to complete Track 3.

We would prefer that Track 3 move forward at a faster pace. However, undue haste at this juncture could have adverse public safety consequences. Fire Map 1 is a crucial foundation for all the other objectives of Track 3 and, ultimately, the successful implementation of numerous fire-prevention measures adopted in this proceeding. It is essential that Fire Map 1 be carefully designed and developed by subject matter experts in a methodical manner.

To this end, the Proposed Work Plan delegates to Cal Fire the primary responsibility for the design, development, and production of Fire Map 1. We are grateful for our sister agency's willingness to take on this challenging task. With Cal Fire's leadership and expertise, we are confident that Fire Map 1 will provide a scientifically sound foundation for the fire-threat maps that are ultimately adopted in this proceeding. The Proposed Work Plan also provides opportunities for the electric utilities, CIPs, other interested parties, and their subject matter experts to provide substantive input regarding all elements of Fire Map 1. This will help ensure that Fire Map 1 reflects the best available expertise regarding the physical and environmental conditions associated with an elevated risk of power-line fires occurring and spreading rapidly.

For the preceding reasons, we find the Proposed Work Plan provides a reasonable but potentially lengthy path for the development and adoption of Fire Map 1. Therefore, we will approve the Proposed Work Plan with the following refinements that are intended to quicken the pace of this proceeding. First, the Proposed Work Plan calls for Cal Fire and its team of experts to (1) review the existing Reax Map and SDG&E Map that were adopted by D.12-01-032 on an interim basis, and (2) provide recommendations regarding the extent to which these two fire-threat maps, either in their current form or with modifications, can serve the purposes of Fire Map 1.⁵

It is possible that the Reax Map and SDG&E Map (in their current form or with modifications) may prove well-suited for the purposes of Fire Map 1. We would prefer to move this proceeding forward at a faster pace with existing fire-threat maps that are well-suited for the functions of Fire Map 1, rather than spending additional time and resources to develop and adopt even better maps. We strongly emphasize, however, that this decision is not meant to influence Cal Fire's work. We expect to accord great weight to Cal Fire's recommendations regarding the design and development of Fire Map 1.

Second, the Proposed Work Plan requires the Track 3 Panel to prepare a document titled "Fire Map 1 Workshop Report" that will contain the Panel's consensus recommendations regarding the design, content, and production of Fire Map 1, and alternate recommendations, if any. The Proposed Work Plan also calls for a Commission decision regarding the workshop report. We conclude that a Commission decision is not necessary if there is no opposition to

⁵ Proposed Work Plan, filed version, at page 6, Item 3.3.d.

the recommendations in the Fire Map 1 Workshop Report. If this situation occurs, the workshop report should state there is no opposition, and the recommendations regarding Fire Map 1 shall be deemed approved. The Track 3 Panel shall then produce Fire Map 1 in accordance with the workshop report as quickly as practical. However, if there is opposition, the parties should follow the procedures identified in the Proposed Work Plan (i.e., file opening and reply comments, motions for evidentiary hearings, etc.). A Commission decision regarding the workshop report will be issued, as appropriate.

Third, the Proposed Work Plan does not provide definitive guidance regarding when the Track 3 Technical Panel should convene to prepare a work plan for Fire Map 2. To avoid unnecessary delay, we will direct the Track 3 Technical Panel convene after the submittal of the Fire Map 1 Workshop Report to prepare a work plan for the design, development, and adoption of Fire Map 2 using the same process and procedures that were used to prepare the Proposed Work Plan attached to this decision. If there is no opposition to the Fire Map 1 Workshop Report, the Track 3 Technical Panel shall convene as soon as practical after the submission of the report. On the other hand, if there is opposition to the Fire Map 1 Workshop Report that necessitates a Commission decision, the Track 3 Technical Panel shall convene as soon as practical after the Commission decision authorizing the production of Fire Map 1.⁶

Fourth, under the Proposed Work Plan, three IOUs (PG&E, SCE, and SDG&E) will provide a maximum of \$250,000 for Cal Fire to hire experts to assist in the design and development of Fire Map 1. The Proposed Work Plan further

⁶ The assigned Commissioner and/or assigned ALJ may hold prehearing conferences and use other case management tools, as appropriate.

specifies that Cal Fire or SED must seek Commission approval to exceed the cap of \$250,000, but the work plan does not state how Cal Fire or SED should request approval or what form the Commission's approval should take. To provide more clarity on these matters, and to avoid needless delays, we will authorize Cal Fire and/or SED to request additional funding of up to \$250,000 (for total funding of \$500,000) by filing a motion. The assigned Commissioner or the assigned ALJ may rule on the motion, as appropriate. Consistent with the Proposed Work Plan, the IOUs shall use the procedures in D.12-01-032, Ordering Paragraph 14, to request recovery of their payments to experts selected by Cal Fire. This decision establishes a rebuttable presumption that such payments are reasonable and may be recovered in rates.

Fifth, the Proposed Work Plan calls for the Track 3 Panel to submit the final version of Fire Map 1 to the Commission for approval, but the work plan does not state how the map will be submitted or what form the Commission's approval should take. Because the map will be produced in accordance with the approved Fire Map 1 Workshop Report (or a Commission decision on the workshop report), there should be no issues associated with the production of the map that require a Commission decision. Accordingly, we will direct the Track 3 Panel or one of its members to file and serve a Tier 1 advice letter that contains the final version of Fire Map 1.⁷ The Tier 1 advice letter and final Fire Map 1 shall be effective when filed, pending disposition by the Commission's Energy Division.

⁷ The Commission may authorize non-utilities to file advice letters. (D.12-11-015 at 11 - 12.)

Finally, we agree with SDG&E that the Proposed Work Plan unnecessarily defers consideration of the ultimate public-safety objectives of the fire-threat maps. We believe the following tasks can proceed concurrently with the development and adoption of Fire Map 1 and Fire Map 2:

1. Developing fire-safety standards for the design and construction of electric utility and CIP structures in the High Fire-Threat District.
2. Assessing whether any of the new fire-safety standards developed pursuant to Item 1 should apply to existing facilities in the High Fire-Threat District.

The Track 3 Panel shall meet at least quarterly to work on the previously identified tasks. SED shall organize and chair the first meeting, and SED may select co-chairs to help with these tasks.⁸ The meetings should be conducted in a manner consistent with the procedures set forth in the Amended Phase 3 Scoping Memo⁹ and the workshop protocols in Appendix C of the Track 3 Report. We anticipate that the Track 3 Panel can develop (1) a menu of fire-safety standards for the design and construction of overhead electric utility and CIP structures in the High Fire-Threat District; (2) criteria regarding where a particular fire safety standard should apply going forward; and (3) criteria for deciding whether existing facilities in the High Fire-Threat District should be retrofitted or replaced to conform to new standards.

We decline to adopt SDG&E's proposal to convene an all-party event where parties may present alternative work plans to the assigned Commissioner.

⁸ At the first meeting, the Track 3 Panel participants may agree on the chairperson(s) going forward.

⁹ Amended Phase 3 Scoping Memo at 7 - 8.

The Track 3 Panel met over a four-month period to discuss work plans. Holding another all-party event would needlessly delay this proceeding. Moreover, SDG&E's proposed all-party event circumvents the directives in the Amended Phase 3 Scoping Memo, which instructed the Track 3 Panel to evaluate alternatives and to include alternative proposals in the Track 3 Report:

The parties participating in the Track 3 Technical Panel are expected to (a) identify the specific issues that will be considered by the panel; (b) determine the order in which the issues will be considered; (c) **evaluate alternative proposals**; (d) present a draft report to all parties in an informal meeting; and (e) prepare, file, and serve a final written **report of their consensus recommendations and alternative proposals**. (Amended Phase 3 Scoping Memo at 7. Emphasis added.)

SDG&E acknowledges that it presented its alternate plan for developing fire-threat maps at the first meeting of the Track 3 Panel,¹⁰ but SDG&E made no further effort to advance its alternate proposal through the Track 3 Panel process. The other parties state that during the Track 3 Panel meetings, all the participants were asked if there were any alternative proposals that should be included in the draft Track 3 Report. SDG&E said nothing. Later, at the all-party workshop held on September 9, 2013, for the express purpose of discussing the draft Track 3 Report and alternatives to any part of the report, SDG&E once again did not mention its alternative proposal.¹¹

¹⁰ SDG&E Comments dated October 7, 2013, at 1.

¹¹ CIP Coalition's Reply Comments filed October 14, 2013, at 3; LA County Fire Dept. and SED Joint Reply Comments filed October 14, 2013, at 1, 8, and 9; and MGRA Reply Comments filed October 14, 2013, at 5.

In sum, SDG&E had a reasonable opportunity to present its alternate proposal during the Track 3 Panel process, but SDG&E chose not to do so. It would be disruptive to the efficient and orderly conduct of this proceeding, unfair to other parties, and establish a troublesome precedent if SDG&E were allowed to circumvent the Track 3 Panel process.

None of SDG&E's criticisms of the Proposed Work Plan convince us that the plan should be rejected. SDG&E claims there is no explanation of the benefits of the Proposed Work Plan and that Fire Map 1 will be of little use as a standalone product. We believe the Proposed Work Plan has the very substantial benefit of setting forth a process that will produce in a statewide, scientifically valid map of utility-related fire hazards. The resulting product, Fire Map 1, will be crucial for drawing the boundaries of the High Fire-Threat District and determining the standards for the design and construction of electric utility and CIP facilities in the High Fire-Threat District.

We are puzzled by SDG&E's criticism that there are several parties with expertise to do the same work as Cal Fire, either in collaboration with Cal Fire or by developing competing products. The Proposed Work Plan provides an open and transparent process for all parties to share their knowledge, expertise, internal databases, and analytical methods with Cal Fire, and to collaborate with Cal Fire in the design and development of Fire Map 1. In fact, the Proposed Work Plan leaves open the possibility that SDG&E's fire-threat map may be adopted as Fire Map 1, but only after SDG&E's map has been vetted by Cal Fire, its team of experts, and the other parties. The Proposed Work Plan also provides an opportunity for SDG&E to present alternatives to Cal Fire's recommendations if SDG&E wishes to do so.

Finally, SDG&E complains that the Proposed Work Plan moves too slowly. We share SDG&E's desire to expeditiously develop, adopt, and implement fire-threat maps and associated fire-safety regulations. Today's decision adopts several refinements to the Proposed Work Plan that are intended to accelerate the pace of this proceeding. At the same time, public safety is better served in the long run if Fire Map 1 is developed in a methodical, scientific, and transparent manner. The Proposed Work Plan, with the refinements adopted by this decision, strikes a reasonable balance among the competing objectives.

6. Need for Hearing

In OIR 08-11-005, the Commission preliminarily determined that hearings are not needed in this proceeding. Parties were provided an opportunity by the Amended Phase 3 Scoping Memo to request an evidentiary hearing regarding the matters addressed by this decision. A timely motion for an evidentiary hearing was filed by the CIP Coalition, which was denied by the assigned ALJ in a ruling dated November 20, 2013. This decision affirms that there is no need for an evidentiary hearing regarding the matters addressed by this decision.

7. Comments on the Proposed Decision

The proposed decision was mailed to the parties in accordance with Pub. Util. Code § 311, and comments were allowed in accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on January 2, 2014, by SDG&E; jointly by the LA County Fire Dept., MGRA, and SED; and jointly by Bear Valley, Liberty Utilities, PacifiCorp, PG&E, and SCE. Reply comments were filed jointly on January 7, 2014, by the LA County Fire Dept., MGRA, and SED. These comments and reply comments have been incorporated, as appropriate, in the final decision adopted by the Commission.

8. Assignment of the Proceeding

Michel P. Florio is the assigned Commissioner for this proceeding and Timothy Kenney is the assigned Administrative Laws Judge.

Findings of Fact

1. The effective deployment of many of the fire-prevention measures adopted in this proceeding depends on maps that accurately identify areas where power-line fires are more likely to occur and spread rapidly. The development, adoption, and implementation of such maps will enhance public safety.

2. The Proposed Work Plan, with the refinements adopted by this decision, provides a balanced approach for designing, developing, and adopting scientifically based fire-threat maps that accurately depict the physical and environmental conditions associated with an elevated risk for power line fires occurring and spreading rapidly.

3. SDG&E circumvented the process required by the Amended Phase 3 Scoping Memo for submitting alternative work plans.

4. SDG&E's alternative work plan might not achieve the objectives for Phase 3, Track 3 of this proceeding any quicker than the Proposed Work Plan.

5. The CIP Coalition's motion for an evidentiary hearing regarding the matters addressed by this decision was denied in a ruling issued by the assigned ALJ on November 20, 2013. There were no other requests for an evidentiary hearing regarding the matters that are the subject of this decision.

Conclusions of Law

1. It is in the public interest to adopt the Proposed Work Plan, with the refinements identified in the body of this decision, for the reasons set forth in the body of this decision and the Findings of Fact.

2. There should be a rebuttable presumption that payments made by PG&E, SCE, and SDG&E to expert consultants and other contractors selected by Cal Fire pursuant to the Proposed Work Plan, with the refinements adopted by this decision, are reasonable and may be recovered in rates.

3. SDG&E's alternate work plan should be denied for the reasons set forth in the body of this decision and the findings of fact.

4. There is no need for an evidentiary hearing regarding the matters addressed by this decision.

5. The following order should be effective immediately so that the Proposed Work Plan may be implemented expeditiously.

O R D E R

IT IS ORDERED that:

1. The *Proposed Work Plan for the Development of Fire Map 1* ("Proposed Work Plan") that is contained in Appendix A of this decision is approved with the following modifications:

- i. The Fire Map 1 Workshop Report that is filed and served pursuant to the Proposed Work Plan shall state whether there is opposition to the recommendations in the report. If there is no opposition, the recommendations shall be deemed approved, and the Track 3 Technical Panel shall produce Fire Map 1 as quickly as practical. If there is opposition, the procedures in the Proposed Work Plan shall apply.
- ii. Following the submittal of the Fire Map 1 Workshop Report, the Track 3 Technical Panel shall convene to prepare a work plan for the design, development, and adoption of Fire Map 2 using the same process and procedures that were used to prepare the Proposed Work Plan attached to this decision. If there is no opposition to the Fire Map 1 Workshop Report, the Track 3 Technical Panel shall convene as soon as practical after the

submission of the report. On the other hand, if there is opposition to the Fire Map 1 Workshop Report that necessitates a Commission decision, the Track 3 Technical Panel shall convene as soon as practical after the Commission decision authorizing the production of Fire Map 1.

- iii. The Track 3 Technical Panel or one of its members shall file and serve a Tier 1 advice letter that contains the final version of the Fire Map 1. The Tier 1 advice letter and final Fire Map 1 shall be effective when filed, pending disposition by the Commission's Energy Division.
- iv. If necessary, the California Department of Forestry and Fire Protection (Cal Fire) and/or the Commission's Safety and Enforcement Division may file a motion to request additional funding of up to \$250,000 (for total funding of \$500,000) for Cal Fire to complete its tasks under the Proposed Work Plan. The assigned Commissioner and/or the assigned Administrative Law Judge may rule on the motion, as appropriate.

2. Concurrent with the development of Fire Map 1 and Fire Map 2, the Track 3 Technical Panel shall convene at least quarterly to develop (a) a menu of potential fire-safety standards for the design and construction of overhead electric utility and communications infrastructure facilities in the High Fire-Threat District; (b) criteria regarding where a particular fire safety standard developed pursuant to the previous Item (a) should apply with respect to new installations and reconstruction in the High Fire-Threat District; and (c) criteria for deciding whether existing facilities in the High Fire Threat District should be retrofitted or replaced to conform to the new standards developed pursuant to the previous Item (a). The Safety and Enforcement Division shall organize and chair the first meeting as soon as practical. The meetings shall be conducted in a manner consistent with (i) the instructions in the Amended Phase 3 Scoping Memo at pages 7 – 8, and (ii) the workshop protocols in Appendix C of the Track 3 Technical Panel Report that was filed on September 23, 2013.

3. There shall be a rebuttable presumption that payments made to the California Department of Forestry and Fire Protection's expert consultants and other contractors by Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company pursuant to the Proposed Work Plan in Appendix A of this decision and the previous Ordering Paragraph 1.iv are reasonable and may be recovered in rates using the procedures in Decision 12-01-032, Ordering Paragraph 14.

4. San Diego Gas & Electric Company's alternate proposal for addressing Phase 3, Track 3 issues is denied.

5. There is no need for an evidentiary hearing regarding the matters addressed by this decision.

6. This proceeding remains open for Phase 3.

This order is effective today.

Dated _____, at San Francisco, California.

Appendix A: Proposed Work Plan

Note: The attached Proposed Work Plan has non-substantive pagination and formatting changes that are not reflected in the copies of the Proposed Work Plan that were filed and served.

RULEMAKING 08-11-005: PHASE 3, TRACK 3**PROPOSED WORK PLAN FOR
DEVELOPMENT OF FIRE MAP 1****1.0 WORK PLAN ELEMENTS**

1.1 Procedural Posture: Commission Decision 12-01-032 instituted Phase 3 of Rulemaking 08-11-005 to address, *inter alia*, the preparation of a detailed work plan for the development, expert review, adoption, implementation, and funding of fire-threat maps that accurately identify areas where there is an elevated risk of catastrophic power-line related fires occurring. The decision divided Phase 3 into three “tracks” – “Track 3” addresses matters related to the fire-threat maps sought by the Commission as a part of this rulemaking. The May 15, 2013 *Assigned Commissioner’s Amended Scoping Memo and Ruling for Track 3 Issues and Deferred Track 1 Issues (Amended Scoping Memo)* set forth the scope and schedule for Track 3. This Proposed Work Plan provides the recommendations of the Technical Panel¹ regarding the manner in which Track 3 issues should be addressed. The Proposed Work Plan was developed through several self-directed workshops noticed by the Commission and open to the public. The workshops were held on June 18, July 17 and 18, and August 7, 13 and 14. Pursuant to the Amended Scoping Memo, an informal all-party meeting with the Track 3 Technical Panel was held on September 9, 2013 to review the Draft

¹ The Technical Panel, as referenced throughout this document, is comprised of interested stakeholders participating in Phase 3, Track 3 of this proceeding (R.08-11-005).

Technical Panel Report and Work Plan. Several drafts of the Proposed Work Plan were developed and circulated amongst the numerous parties for discussion. The Proposed Work Plan represents the agreements reached by the workshop participants.

1.2 Two-Step Mapping Sequence: The Proposed Work Plan provides for the development of statewide maps depicting the fire hazards and the fire threat zones for regulatory implementation relative to the location and operation of overhead electric and/or communications facilities using a two-step sequence. In the first step of the sequence, a statewide map depicting fire hazards called the “CPUC Wildfire Hazard Map” (Fire Map 1), will be produced. Fire Map 1 addresses the physical and environmental conditions associated with elevated potential for utility-associated wildfires. In the second step of the sequence, a statewide map depicting classified fire threat zones for the implementation of regulations called the “CPUC Wildfire Threat Zone Map” (Fire Map 2), will be produced and issues deferred from Track 1 will be addressed.² Fire Map 2 addresses the implementation of regulations designed to reduce the potential for utility-associated wildfires. Fire Map 2 will include any additional data related to fire consequences, adjustments based on existing or planned utility infrastructure, and the creation of classifications that will be used for regulatory purposes. The parties to this proceeding may also consider inclusion of weighting for assets at risk or potentially affected population, depending on what parties agree or the Commission determines are the proper purposes and

² Among the deferred Track 1 issues are those related to revisions to General Order 95. See *Amended Scoping Memo*, at p. 4; see also, p. 6 (Section 3, Bullets 3.i through 3.v).

uses of the map. Finally, Fire Map 2 will include the mapping resolution of the deferred Track 1 issues.

The mapping of utility fire threat zones is dependent on the prior mapping of fire hazards and therefore would commence following the production of Fire Map 1. The Proposed Work Plan thus focuses on and provides the procedures for completing Fire Map 1. Once Fire Map 1 is completed and reviewed for quality assurance, the parties and Commission would turn their attention to the development of Fire Map 2 and the deferred Track 1 issues.

1.3 Technical Expertise and Independent Review: The Proposed Work Plan assigns the task of identifying and mapping the conditions relevant to the assessment of fire hazards to a pool of subject matter experts that will be led by Dave Sapsis of the California Department of Forestry and Fire Protection (Cal Fire) and will submit recommendations to the Technical Panel. Cal Fire will identify any additional resources and experts it deems necessary (as discussed further below). The makeup and process used for the development of Fire Map 1 should be restricted to science issues related to fire hazards associated with utility infrastructure.

Cal Fire has been solicited as an expert third-party to serve as independent lead for the pool of subject matter experts, and has agreed to serve in that function if specific acceptable procedural, organizational, and scheduling requirements are met. Cal Fire wants to avoid administrative oversight of the process because of its existing regulatory duties tied to fire cause/origin and related civil/criminal actions from unwanted fires. SED will serve in an administrative role to help facilitate meetings of Cal Fire and the pool of experts to produce a Map Review and Development Report presenting the findings and

recommendations of the pool of experts regarding matters relevant to the design and production of Fire Map 1.

1.4 Work Plan Process/Schedule Limitations: This Proposed Work Plan is limited to setting the process and schedule by which the first step of the recommended two-step mapping sequence, *i.e.*, the development and production of Fire Map 1, will be completed. The second step of the two-step sequence, *i.e.*, the development and production of Fire Map 2, as well as addressing the deferred Track 1 issues relevant to Track 3, is completely dependent on the completion of Fire Map 1 and so must necessarily follow the first step. Because these other tasks will be informed by the products and related lessons learned in the development of Fire Map 1, the Technical Panel proposes the development of more detailed work plans for the development of Fire Map 2 and the deferred Track 1 issues be addressed following the completion of the first step. Under the Proposed Work Plan, the Technical Panel anticipates that Fire Map 1 would be completed during the First Quarter of 2015. A work plan for step two would follow soon thereafter.

2.0 FUNDING OF INDEPENDENT EXPERTS

The pool of experts, led by Cal Fire, will provide an independent expert review of existing fire threat maps (*i.e.*, SDG&E and REAX maps), and advice and recommendations to the Technical Panel regarding the creation of Fire Map 1. Cal Fire will identify any additional resources it deems necessary to provide this independent review and advice. The selection and supervision of those resources will be directed by Cal Fire and will be secured under procurement procedures and a funding mechanism approved by the Commission as noted below.

Cal Fire will identify the additional external technical experts, alternates and other resource requirements it determines, in its sole discretion, would be best-suited and necessary to accomplish the tasks of reviewing existing fire threat maps and creating Fire Map 1. Based upon Cal Fire's determination of a need for additional expertise and resources for this task, the expectation that expenses will be limited, and in the spirit of cooperation, the three largest investor-owned electric utilities (IOUs), PG&E, SCE, and SDG&E, have volunteered to pay the cost for additionally needed technical expertise or resources – subject to the following additional provisions:

1. Total expenditures for any funding of needed experts or resources, as determined by Cal Fire, up to and including the creation of CPUC Fire Map 1, will not exceed \$250,000 unless the requirements of No. 5 are met;
2. The payment of costs by PG&E, SCE, and SDG&E for the limited purpose identified in No. 1 shall have no precedential value as to the percentage of cost responsibility or non-responsibility of other parties for any other aspect of this proceeding, including, but not limited to, expenditures on experts necessary to complete the mapping effort, addressing Track 1 deferred issues of this work plan, or for any other purpose or in any future proceeding;
3. PG&E, SCE, and SDG&E may expense these cost to their Fire Hazard Prevention Memorandum Accounts (FHPMAs) that are described in D.12-01-032 at pages 153 - 156.
4. Based on the fact that the need for the additional expertise will be determined by Cal Fire and that the work will be directed and reviewed by Cal Fire, expenditures by PG&E, SCE, and SDG&E that do not exceed the cost cap of \$250,000 shall be presumed reasonable by the Commission; and
5. Cal Fire and/or SED must seek Commission approval to exceed the cost cap, if needed. The cost responsibility for any additional expenditures above the initial \$250,000 cost cap will be considered at that time. If PG&E, SCE, and SDG&E again volunteer to pay the cost of any additional expert expense, any

costs incurred and booked in the respective FHPMAs will be presumed reasonable up to any new/revised cost cap authorized by the Commission.

PG&E, SCE, and SDG&E would prepare and execute appropriate contract or contracts under terms and conditions appropriate to Cal Fire's requirements³ and the utility's normal contracting practices.⁴ The contractor would be required to record the billable costs of its time, materials and expenses, which would be reviewed for accuracy and reasonableness by Cal Fire and/or SED. After approval from Cal Fire and/or SED, the contractor would directly bill the each of the three participating IOUs, allocating the amount of the bill to each IOU in a percentage determined by the IOUs.⁵

3.0 MAP REVIEW AND DEVELOPMENT POOL OF EXPERTS

3.1 Composition and Function of Pool of Experts: A consultative pool of subject matter experts organized and led by Cal Fire will review existing fire threat maps and will recommend criteria for the development of Fire Map 1 to the Technical Panel. The range of disciplines covered may include, but is not

³ As an example, the contract would provide that services would subject to the supervision of CAL FIRE and any limits as to time, expenses and costs to be determined by CAL FIRE, with the understanding that payment by PG&E, SCE, and SDG&E would be subject to the five provisions above or any provisions adopted by the Commission.

⁴ As an example, investor-owned electric utilities routinely include provisions encouraging any contractor, to the extent subcontractors are engaged, to utilize Commission-audited firms owned by women, minorities, and/or disabled veterans.

⁵ The contractor would bill each of the participating investor-owned electric utility for its share of the billable costs using the following allocation: PG&E (49%), SCE (41%), and SDG&E (10%). This allocation is based on 2011 annual electric revenue as an allocation proxy.

limited to, mechanical engineering/stress analysis; wildland fuels and fire behavior science, heat transfer modeling; meteorology; actuarial science and risk analysis; GIS and spatial model development; and modeling sensitivity. Individuals may cover more than one identified area of expertise, and alternatively, more than one individual may cross-over into multiple subject areas as their skills and experience allow. The desire is to keep the pool of subject matter experts relatively small, nimble, and capable of fully encompassing the scientific requirements associated with the needs and objectives associated with the construction of the Fire Map 1 product. SED will provide administrative and institutional support.

3.2 Conduct of the Pool of Experts: Cal Fire, along with the pool of experts it has selected, will review existing maps (i.e., SDG&E and REAX maps), and will solicit and/or review information, comments and suggestions provided by parties, and develop specific model elements and map requirements for creating a scientifically valid, accurate, and workable Fire Map 1. An overview of the work process is described below:

- A majority of the work will be conducted by the pool of experts. The pool of experts will undertake the day-to-day development of Fire Map 1 elements, which provide the basis for status reports to and discussions with stakeholder experts and/or the Technical Panel.
- SED will facilitate meetings and the exchange of information with stakeholder experts.⁶ Stakeholder experts will participate in meetings with Cal Fire and the pool of experts to receive status reports, to provide real time input to the pool of experts

⁶ Stakeholder experts are individuals identified by various parties and who have expertise in one or more disciplines, as defined in Section 3.1 above.

regarding key process and model decisions, and to assure that the pool of experts has the benefit of best available information and expertise.⁷ Interested non-expert stakeholders will also be permitted to participate in these meetings; however comments and feedback to the pool of experts from non-expert stakeholders should be addressed through an existing stakeholder expert. Comments and feedback are designed to be restricted to the scientific basis underlying the objectives of Fire Map 1. The comments/feedback and any responses will be made part of the Map Review and Development Report.

- SED will also convene meetings of the Technical Panel, which will be open to all parties to this proceeding and publicly-noticed on the Commission's Daily Calendar, where status reports will be presented to the Technical Panel. These Technical Panel meetings will be comprised of at least two in-person meetings, one where SDG&E and REAX will present criteria, methodology, findings, and lessons learned from the creation of their existing fire-threat maps and a second where the consultative pool of experts will be available to present their findings and recommendations to the Technical Panel.

3.3 Map Review and Development Report: A Map Review and Development Report outlining the initial findings and recommendations of Cal Fire and the pool of experts, any alternative recommendations and responses to input received, and a detailed work plan for the creation of Fire Map 1 will be prepared. Recommendations on the following items shall be included in this report:

- a) Determining the physical and environmental conditions creating or contributing to the existence of fire hazards which should be reflected in Fire Map 1;

⁷ It is anticipated that these meetings will be scheduled at least every two weeks and may occur in-person, via email, or telephonically.

- b) Selecting the data and source information which should be used to depict the physical and environmental conditions to be reflected in Fire Map 1;
- c) Determining and/or developing the methodologies by which each of the data and source information depicting the physical and environmental conditions to be reflected in Fire Map 1 will be transmuted into graphic form and represented in the Fire Map 1;
- d) Determining the extent to which, if any, the existing REAX and SDG&E fire-threat maps adopted in Decision 12-01-032 might serve the purposes of the Fire Map 1 process and, if not, the manner in which they might be modified so as to serve those purposes;
- e) Determining the manner in which the Fire Map 1 would be updated periodically;
- f) Identifying the values that are critical for the development of Fire Map 1 to be delivered to the parties in a medium importable into GIS; and
- g) Addressing such other matters relevant and appropriate to the development of the Fire Map 1 as determined by Cal Fire and the pool of experts.

Cal Fire will have the ultimate authority to make the final recommendation for the pool of subject matter experts working under its direction. Any alternative proposals shall be documented and included in the Map Review and Development Report to the Technical Panel, as appropriate.

SED will serve the Map Review and Development Report describing the findings and recommendations of Cal Fire and the pool of experts on all parties to this proceeding. SED will convene a public workshop where Cal Fire and the pool of experts will provide an explanation of their findings and recommendations. At this public workshop, alternate proposals and recommendations may be presented by any stakeholder.

The Technical Panel will produce a draft Fire Map 1 Workshop Report (which will provide recommendations to the Commission based on Cal Fire and the pool of experts' findings and recommendations, any alternative recommendations, and the detailed work plan) for Commission approval and adoption. The draft Fire Map 1 Workshop Report summarizing the publicly noticed workshop results will be served and parties will be invited to provide comments and alternate proposals to the Technical Panel. Following the receipt and consideration of comments and any alternate proposals, the Technical Panel will file a final Fire Map 1 Workshop Report, including any comments and alternate proposals, with the Commission with service on all the parties. Comments and reply comments regarding the Workshop Report will be filed with the Commission with service on all parties. At the time reply comments are filed and served, parties will be permitted to file a request for evidentiary hearings with respect to any matters they demonstrate would be benefitted through such hearings.

At the conclusion of the public processes, the Commission will have a final Fire Map 1 Workshop Report, (which incorporates the recommendations of the Technical Panel, based on the findings and recommendations of Cal Fire and the pool of experts, and any alternative recommendations) to consider in its decision concerning the manner by which Fire Map 1 would be produced. After the Commission's decision, the pool of experts will create Fire Map 1 in draft form. SED will facilitate Fire Map 1's review in a public process for quality assurance purposes. Once vetted, the final version of Fire Map 1 would be submitted to the Commission for adoption. Once the Commission adopts Fire Map 1, the parties would reconvene to develop a work plan leading to the adoption of Fire Map 2.

4.0 PROPOSED WORK PLAN SCHEDULE

The Proposed Work Plan is expected to facilitate the development and completion of a final Fire Map 1 sometime during 2015. During the workshop discussions, the workshop participants developed a schedule (Attachment 1) for the activities, milestones and processes comprising the Proposed Work Plan. The schedule reflects the workshop participants' best estimates of the reasonable amount of time the major activities in the Proposed Work Plan would take. In developing the time estimates, the workshop participants agreed that, while best efforts would be made to meet the schedule timeframes, the estimates may prove incorrect. In the event delays lead SED to believe that at least ninety (90) additional days will be required to complete Fire Map 1, SED will update the ALJ/Assigned Commissioner as to the reasons for the delays and the expected total additional days that will be required. Cal Fire and the pool of experts will continue to proceed with its work, pending further directions from the ALJ/Assigned Commissioner. It might also be the case that certain activities, individually or collectively, could take less time than estimated, in which case the ensuing steps would begin earlier than proposed.

Also attached are diagrams of the work plan elements and schedule through the creation of Fire Map 1 (Attachment 2) and the work flow for reviewing existing fire threat maps and creating Fire Map 1 (Attachment 3).

ATTACHMENT 1

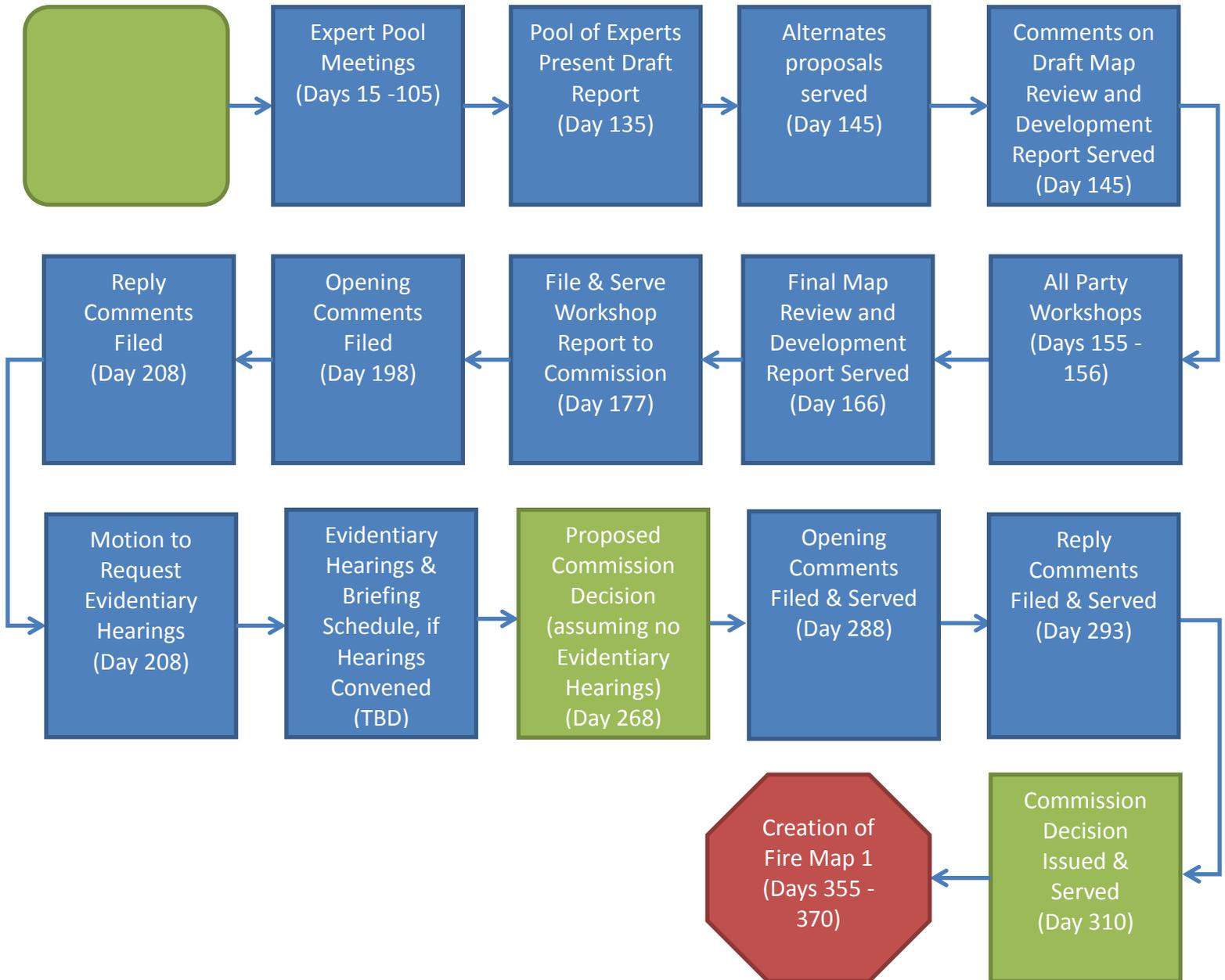
PROPOSED WORK PLAN SCHEDULE OF ACTIVITIES AND MILESTONES

Task	Schedule
Commission Decision or Ruling of Assigned Commissioner and/or Presiding Administrative Law Judge Approving Proposed Work Plan Issued and Effective.	Day 0
Begin retaining experts for Cal Fire and establish milestone meeting schedule	Days 1 through 14
Map Review and Development Activities as defined in Section 4	Days 15 through 105
Draft Map Review and Development Report Served on Parties with Notice of Public Workshops.	Day 135
Alternate Proposals and Comments on Draft Map Review and Development Report Served on Parties.	Day 145
Public All-Party Workshops.	Days 155 and 156
Final Map Review and Development Report Served on Parties	Day 166
Workshop Report Filed with Commission and Served upon Parties.	Day 177
Opening Comments on Workshop Report Filed with Commission and Served upon Parties.	Day 198
Reply Comments on Workshop Report Filed with Commission and Served upon Parties.	Day 208
Deadline for Filing and Serving Motions for Evidentiary Hearings.	Day 208
Evidentiary Hearings and Briefing Schedule if Hearings Convened.	TBD
Proposed Commission Decision re: Workshop Report (assuming no evidentiary hearings are convened).	Day 268
Opening Comments on Proposed Commission Decision Filed and Served.	Day 288
Reply Comments on Proposed Commission Decision Filed and Served.	Day 293
Commission Decision Issued and Served.	Day 310
Fire Map 1 Developed (under terms of Commission Decision): <ul style="list-style-type: none"> • Development of Draft Fire Map 1. • Public All-Party Workshops and Quality Control Vetting. • Technical Panel finalizes Fire Map 1 and Submits to Commission. 	Day 355 through Day 370

ATTACHMENT 2

**DIAGRAM OF THE WORK PLAN ELEMENTS
AND SCHEDULE**

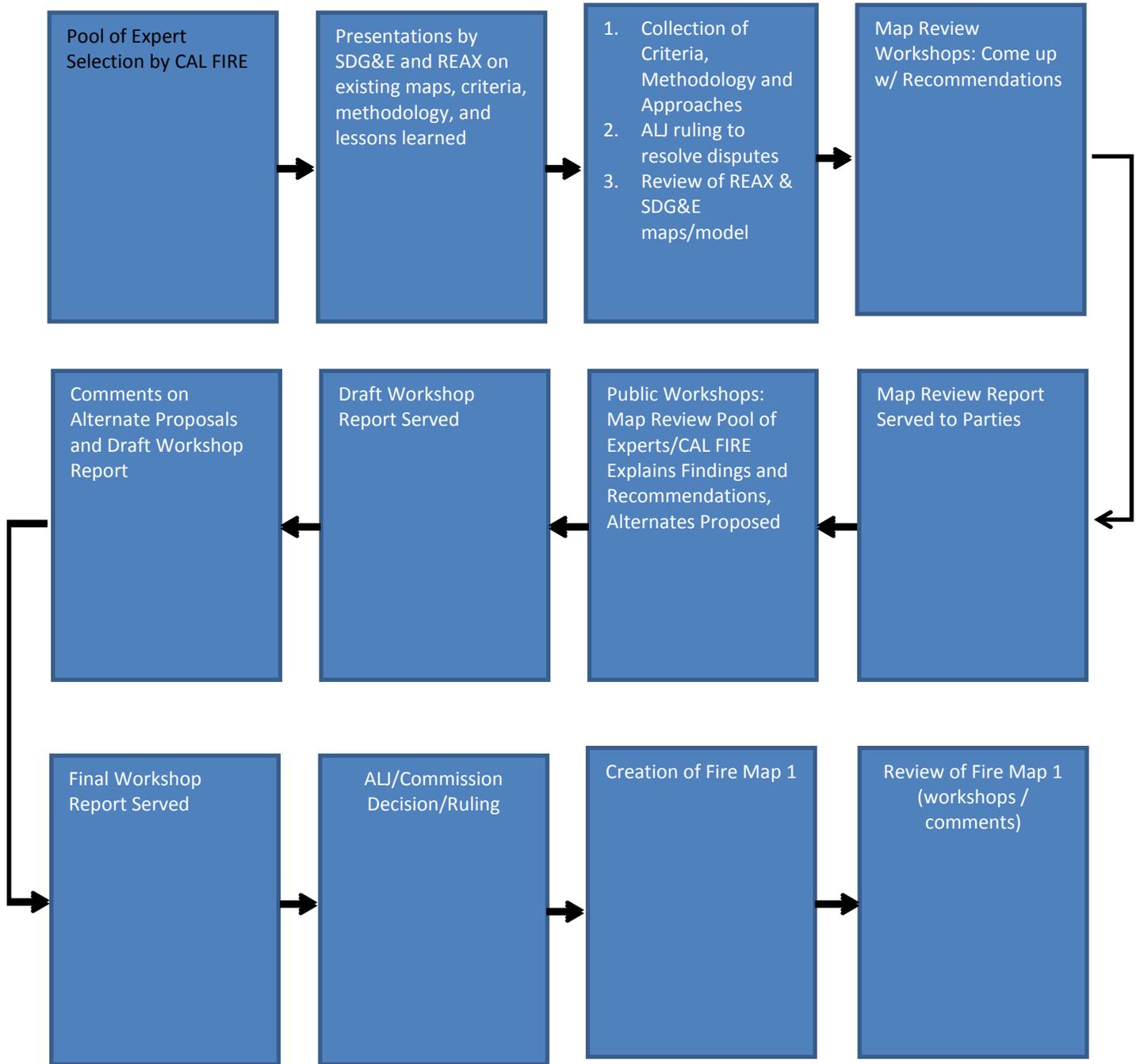
Attachment 2 – Work Flow Diagram from Approval of Proposed Plan to Creation of Fire Map 1



ATTACHMENT 3

WORK FLOW DIAGRAM FOR MAP REVIEW AND CREATION OF FIRE MAP 1

Attachment 3 – Work Flow Diagram for Map Review and Creation of Fire Map 1



(END OF APPENDIX A)